

## **ANNUAL REPORT, INDEPENDENT NEWS & MEDIA (NI)**

*Period of report: Sep – Dec 2014*

### **Introduction:**

Independent News & Media is the largest newspaper publisher in Northern Ireland, with offices currently situated at 124-144 Royal Avenue, Belfast.

The company publishes the Belfast Telegraph and Sunday Life newspapers, the associated website [www.belfasttelegraph.co.uk](http://www.belfasttelegraph.co.uk), and a range of other digital products including NICarFinder.co.uk, NIJobFinder.co.uk and PropertyNews.com.

The company is also a commercial printer, printing and distributing newspapers, including UK nationals, across Ireland from its press halls in Belfast and Newry. Independent News & Media in Northern Ireland is part of Dublin-based Independent News & Media, publishers of the Irish Independent and other titles in the Republic of Ireland.

The publisher's responsible person for IPSO is managing director Richard McClean. The person with responsibility for the annual report is Paul Connolly, formerly group managing editor who is currently a freelance consultant who also holds the title of Readers' Editor.

### **Our editorial standards:**

INM fully subscribes to the principles of UK industry best practice including IPSO's advice and guidance.

Editorially, our guiding documents are the Editors' Code of Practice and the Editors' Codebook, and ethics training as given to trainee journalists (mostly on NCTJ-approved courses). Both editors wrote to all reporters during the audit period to explain about IPSO and the context of its work. They also pointed out that IPSO operates a whistleblower's hotline for journalists who believe they have been asked to perform an unethical action.

At a corporate level, our guiding principles are contained in the group-wide policy document "*INM Plc – Code of Conduct*", a copy of which is included in this submission. This policy document sets out the standards of behaviour expected of all employees and includes a company ethics telephone hotline.

INM is happy to seek both pre and post-publication guidance from IPSO. Senior staff have been issued with daytime and out of hours phone numbers in particular for pre-publication guidance should it be required. Pre-publication guidance was not required during Sept – Dec 2014, however previously the company had often sought such guidance from the PCC.

Editorial managers are expected to have detailed legal, ethical and regulatory knowledge. Although somewhat in disuse more widely, the so-called Reynolds Principles are still viewed having value and managers are encouraged to include them in deliberations.

In the small number of occasions where covert filming is deployed, mainly by Sunday Life reporters, editorial managers are also expected to take special cognisance of rules and sensitivities, and to debate and record reasons why covert filming is permissible in advance of any such act as

per the Editors' Code. Examples of Sunday Life covert filming include sex for sale and drugs exposes. Editorial discussions regarding these matters are recorded in the news editor's diary.

Verification of stories follows the standard journalist model:

1. Information is gathered and evaluated
2. The legal and ethical basis of proceeding is considered
3. A decision is made on whether to proceed with the pursuit of the story
4. A cornerstone of reporting is that, where at all possible, which is in almost all cases, the subject of the allegation is given adequate time to respond.
5. Depending on response, a decision is then made on the merits of publication and whether the article meets the legal, ethical and commercial tests for publication.

Both the Belfast Telegraph and Sunday Life have access to pre-publication legal advice from Belfast-based McKinty & Wright solicitors including an evenings and Saturday/Sunday on-call service. This service is regularly employed, particularly in difficult or challenging stories. Lawyers of course are given full details on the nature of information used and all attempts at verification. Final authority for publication rests with editors.

#### OUR COMPLAINTS HANDLING PROCESS:

The editorial complaints handling process is much improved from days of old when in common with many newspapers complaints were further down the agenda for busy newsdesks than is the case now.

Complaints can be accepted in writing, email or telephone to reporters or senior executives and the editorial secretary. Reporters must escalate the complaint to a manager almost immediately. During the audited period, a complaints protocol was forwarded to staff with written instructions on how to deal with complaints (**attached**).

**Editorial complaint route, Belfast Telegraph:** complaints are directed to the Editor, who has final say, but who delegates the day-to-day investigatory and procedural work to the Group Editorial Executive. This pattern is mirrored for both IPSO and non-IPSO complaints, where the Group Editorial Executive will investigate and report to the Editor. Remedies can include corrections and verbal or written communications to the complainant defending, apologising etc as appropriate. The paper also has a Readers' Editor service which is empowered to accept and investigate complaints. **It should** be noted that **Belfast has** long **been** a highly litigious city – in **many** fields, not just in defamation, etc - with plaintiff-friendly libel laws (the local **government refuses** to extend the Defamation Act 2013). Many complainants go directly to lawyers, leading to a high number of letters of claim, which are often the first the paper knows that anything is wrong.

**Editorial complaint route, Sunday Life:** the system is similar to the Belfast Telegraph's although the Editor and News Editor are the key figures as Sunday Life does not have a Readers' Editor and the Group Editorial Executive does not deal with Sunday Life complaints.

**Records of editorial complaints and their outcomes:** All complaints relating to IPSO are recorded on a complaints register (**attached**), and all legal complaints are recorded on a legal provisions risk register. INM believes it needs to do more to formally record lower-level non-IPSO complaints. This process is being reviewed with a view to putting a new protocol in place to strengthen the recording of 'less serious', non-IPSO complaints.

**How we seek to resolve editorial complaints:** Wherever possible complaints are sought to be

resolved by agreement with the complainant. Where this is not possible, the complaint is advised about IPSO, its work and given its contact details.

**What information we provide to readers, and where, about internal and IPSO complaints processes:** The print edition carries an advert (see example attachment). Additionally, every online page on the website carried a 'complaints' button which directs to a page titled: "How to make a complaint – Belfast Telegraph and Sunday Life". The thrust of this is to complain first to the Editor. If the complainant remains unsatisfied, there is also a direct link to IPSO's website.

**Our training process:** No training carried out in the relevant period (nb: some training was conducted the following year)

**Our record on compliance:** See attachment. Of four complaints against the Belfast Telegraph, one was resolved directly with the complainant. In the other three, no breaches of the Editors' Code were found. Of two complaints against the Belfast Telegraph, no code breaches were found.

There were no other incidents of code breaches or significant code compliance terms.

**Attachments:**

*INM Code of Conduct*

*Protocol on receiving complaints*

*Belfast Telegraph/Sunday Life IPSO complaints register Sep-Dec 2104*

*Typical page 2 of Belfast Telegraph with complaints advert*





Independent  
News & Media PLC

# INM Plc. Code Of Conduct

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Date of Issue	Version
June 2014	V 1.2 Updated June 2014



## A Message From Our CEO

*In INM we believe that business should be built on trust and integrity, on ethical performance and on respecting and safeguarding the interests of the wider community. Getting ahead through unethical actions is never acceptable.*

*The code set out in the following pages details the values and behaviours that we expect of our employees. It offers guidance on key ethical areas which one may encounter in our day to day business dealings. It is not meant to be an exhaustive list and is no substitute for common sense. Please take the time to review this code and consider its contents.*

*Ethical dilemmas can often be complex. If in doubt or if you need further clarification talk to your manager. If you do become aware of unethical behaviour I strongly encourage you to report it through one of the channels outlined in the section on obtaining advice and raising concerns. No employee will be penalised or retaliated against for raising a concern in good faith.*

*INM believes that strong values and principled leadership are crucial to the on-going success of our business. As employees of INM we should always be mindful of the responsibilities that we have to each other and to our stakeholders. With this in mind it is essential that we conduct our business with the highest standards of ethics and integrity at all times.*

Thank you,

Vincent Crowley (Chief Executive Officer)



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## Introduction

INM is committed to maintaining the highest standards of ethical behaviour. Business operations within INM are often complex and good ethical behaviour does not boil down to a series of do's and don'ts. Even the appearance of improper behaviour can have serious repercussions on INM's reputation. This code outlines some of the key principles underpinning ethical behaviour in INM. It applies to all employees (which for the purpose of this code includes agents, contractors, consultants, board members and any other parties representing/performing services on behalf of the INM Group).

You should familiarise yourself with this code and apply the principles in your day to day business dealings in INM. Managers have additional "dos" and "don'ts" to promote the code. They should lead by example and ensure that employees under their supervision are aware of our ethical values. Managers should be supportive of those individuals who raise questions in this area or have ethical concerns.

The code is by no means exhaustive and serves to act as a guide in this area. Ultimately the ethical culture of INM depends on the moral standards of its employees, their ability to exercise good judgement and their willingness to flag ethical concerns when they arise.

This code may be amended from time to time and any revised version of the code will be published on the Group website.





## **Our Responsibilities**

We are committed to acting in the best interests of our stakeholders which includes:

### **Commitment to our employees**

INM's growth as a leading international newspaper and communications group has been underpinned by the dedication and commitment of its employees. We recognise that they are central to our organisation. We embrace diversity, seek to reward performance and are actively committed to promoting the well being of our employees.

### **Commitment to our customers**

The core philosophy of our business continues to be meeting our customers' needs. From its local Irish newspaper origins, the INM Group has expanded across the globe to encompass a multi-ethnic, geographically and culturally diverse audience. While our product offering has expanded to include printing, distribution, wholesaling and education our commitment to offering the highest level of quality and service to our customers remains steadfast.

### **Commitment to the market place**

We aim to compete vigorously but fairly in the market place and in a manner that complies with all relevant laws and regulations.

### **Commitment to our shareholders**

In INM we are guided by our duty to act in the best interests of INM and our shareholders. By promoting long-term stable growth the business aims to build enduring shareholder value. We recognise that our relationship with our shareholders is built on trust and transparency. We are committed to maintaining the highest standards of corporate governance and ensuring the correct mix of experience at Board level, for the optimum strategic and operational governance of the INM Group.

### **Commitment to our community**

From the outset the INM Group has always been acutely aware that no organisation can survive, let alone flourish, in a vacuum, without reaching beyond itself to make a deeper contribution to the well being of society. This commitment is at the heart of the INM Group's ethos and underpins how we conduct our business, mindful of our corporate, social and environmental responsibilities to sustainable development.



## **Our Commitments in Action**

### **Commitment to our employees**

#### ***Discrimination and Harassment***

We recognise that our employees are one of our greatest assets. They are the face of our business and, combined with our market-leading brands, are the point of recognition for our many millions of consumers.

Our human resource policies reflect the central role that our employees play in our organisation. These policies focus on ensuring equal opportunities for all and promote diversity through our workforce to the greatest possible extent. We aim to positively engage with employees in a way that will assist them to achieve their maximum potential.

Individuals within INM have the right to work in an environment which is free from discrimination and harassment. Employees should be treated with respect and dignity at all times. All of our employees are recruited and promoted on the basis of suitability for the job.

Discrimination/harassment on grounds such as age, race, religion, gender, sexual orientation, marital or family status, disability or, in Ireland, membership of the traveller community is unacceptable and employees who are found to be in breach of this principle may be subject to disciplinary action.

Both managers and employees in INM are responsible for creating and maintaining a workplace free from discrimination and harassment.

If you are subject to harassment or feel discriminated against, please speak up by using one of the resources listed in the section on “obtaining advice and raising concerns”. INM does not tolerate retaliation against any employee who reports a concern in good faith, even if that allegation is found to be unsubstantiated.

#### ***Personal Information***

The business is mindful of the fact that it holds confidential and sensitive data relating to its employees. Appropriate measures should be in place to ensure that such information is protected and never used for improper means. Personal information should always be managed in accordance with our employment policies, relevant data privacy and protection laws and best practice.

#### ***Health and Safety***

We are committed to safeguarding the health and safety of those people who work in or visit our organisation by providing appropriate training and professional expertise where required. In addition, each of us has an individual responsibility to ensure that health and safety is never compromised. To maintain a safe working environment employees are expected to:

Comply with all applicable local legislation in this area;



- Follow guidelines issued by the business with regard to health and safety;
- Understand the hazards associated with their job and workplace and ensure that they are being adequately managed;
- Ensure that employees and contractors work in a safe manner and use appropriate health and safety equipment as required;
- Never work while under the influence of alcohol, illegal drugs or misused prescription drugs;
- Raise any health and safety concerns that they become aware of even if it is not within their area of responsibility; and
- Report accidents, near misses, breaches of health and safety as soon as possible.



## **Commitment to our customers**

### ***Editorial principles***

A newspaper's greatest assets are its integrity and credibility. INM requires its editors and editorial staff to be professional, courageous and aggressive in pursuit of truth in the news. It is also committed to independence, fairness and balance in informing people of events and issues which they have a right to know. This right is balanced by compliance with the laws of defamation and privacy and adherence to the principles of taste, balance and accuracy. INM titles will not promote or encourage illegal activities or violence to achieve or further political objectives or foment violent activities aimed at undermining the lawful institutions of the country. These principles apply equally to content disseminated via the web, mobile and other electronic devices.

### ***Confidentiality***

As part of our business relationship with our customers we are entrusted with personal and sensitive data. Subject to any legal requirement to disclose information, we are committed to ensuring that such information is safeguarded at all times, is never shared with unauthorised parties and is maintained in accordance with relevant data privacy and protection laws as well as best practice. Employees are expected to be mindful of their responsibilities in this area and should ensure that the usage, storage and transfer of such information is managed effectively and securely and in accordance with this code and any policies that may apply from time to time.

### ***Marketing and Promotion***

We should ensure that all sales and promotion practices are truthful, balanced and do not mislead our customers. Any competitions should be conducted in a manner which is open, honest and legal.



## **Commitment to the marketplace**

### ***Competitive information***

We should ensure that any information we obtain regarding competitors activities is ethical and in compliance with local laws and regulations. We should never use improper means to obtain unauthorized or confidential information about our competitors. This can include deception, obtaining information from current or former employees of competitors, relying on personal or professional relationships or offering inducements to gather information on a competitor which is not in the public arena and which would be considered sensitive.

### ***Colluding with competitors***

We should never enter into an arrangement with competitors, formal or informal, with the intent or effect of limiting competition. Such an arrangement could include setting prices, fixing terms and conditions, limiting production, dividing up markets or boycotting customers and/or suppliers. Given that INM engages with its competitors as part of its service offering, we should be highly vigilant that any dealings with competitors do not contravene local competition laws. Violating these laws can have severe implications for both our organisation and individuals involved. Given the complexities in this area you are encouraged to raise any concerns you may have on this area with your manager.

### **Communications**

As a business we need to ensure that information disseminated to the public is accurate, consistent, timely and in compliance with local laws and regulations. To protect our company's reputation it is important that external communications are handled by designated spokespeople for the INM Group. We should not make any representations on the INM Group's behalf unless it is part of our job responsibility or where instructed to do so by our manager. If any employee has any doubts regarding communication of information to external stakeholders they should consult with their manager.



## **Commitment to our shareholders**

### ***Company assets***

Company assets such as cash, inventory, computers, telephony, and IT hardware and company vehicles are an essential element of INM operations. We should ensure that these company assets are used appropriately and for purposes intended. Proper measures should be in place to protect them from loss, theft, damage and misuse. Electronic communication systems within INM should be used sensibly. It is unacceptable to use INM systems to send unauthorized communications or conduct business for another organization. Under no circumstance should we use INM systems to view or download content that is illegal harassing or insensitive. Employees should have regard to any applicable local laws and company policies on email and internet use. When using these systems, your rights to privacy are limited. Usage of INM's information systems may be subject to monitoring to protect our business, reputation and equipment from misuse. Intellectual property such as trademarks, content, copyrights, domain names, trade secrets and other assets provide INM with a competitive advantage over its competitors. We should take all reasonable steps to ensure that INM's intellectual property is protected. We should also respect the intellectual property of others and ensure it is not infringed.

### ***Accurate and complete records***

A wide range of stakeholders including investors, banks, tax authorities, customers and suppliers rely on the integrity of our disclosures and business records. Incomplete or inaccurate information impacts on our credibility and reputation. Falsifying or misrepresenting information can constitute fraud.

Employees within INM must ensure that records maintained are accurate, timely and complete. Inflating key metrics such as sales or circulation, shifting results between reporting periods or maintaining off balance sheet accounts is never acceptable and can result in investigations, fines, legal actions and significant damage to reputation (as well as disciplinary action for the relevant employee). If you suspect a potential problem in this area you are encouraged to raise your concern through the relevant channels outlined in the section "Raising a concern". Within INM there is a policy of no retaliation. This means that INM will not penalise or tolerate retaliation against any employee who reports a concern in good faith, even if that allegation is found to be unsubstantiated.

### ***Confidential information***

Confidential information is information which is not available to the public and can take many forms such as strategic plans, intellectual property, and financial information, contractual arrangements with suppliers and business partners and subscriber details. We must take reasonable steps to ensure that confidential information is adequately safeguarded. Such information should never be used for purposes other than legitimately carrying out one's job (and then, only for the purpose for which the information was received) and should only be shared with internal and external parties who have been authorised to receive such information. In safeguarding confidential information we should:

- Ensure that information held is accurate and current;
- Take reasonable steps to secure confidential information;
- Communicate information only to those who are authorised to receive it;



- Be mindful of discussing sensitive information in public; and
- Ensure that information is held in accordance with data privacy and protection laws and any special requirements that may apply to the relevant information (e.g. where the information is subject to restrictions under a non-disclosure or confidentiality agreement)

### ***Insider trading***

Inside information relates to non public information which would be likely to significantly influence an investor's decision to buy, sell or hold securities in that company or to affect the price generally of securities or related securities in that company. The use or disclosure of inside information to make investment decisions is illegal in many countries. Examples of inside information can include financial results, new products, changes in the Board and acquisitions and divestures (or any plans or information with respect thereto).

As part of our work, we may become aware of inside information relating to INM or companies that it does business with. We should never use such inside information or share it with others for the purpose of making an investment decision until such information has become public (even after an employee or agent no longer works with INM or the INM Group).

Employees are prohibited from spreading false or misleading information about the company or engaging in activities designed to manipulate the price of securities in INM. Breach of this principle may result in disciplinary action. The above applies to INM or any its subsidiaries or investments that the inside information pertains to.

### ***Conflicts of interest***

A conflict of interest may occur when our personal interests interfere, or appear to interfere, with our ability to perform our jobs effectively and without bias. We are expected to act in the best interests of the INM Group as well as, in the case of directors, in accordance with fiduciary duties owed to those companies on which a director sits on the board. Business decisions should not be affected by our personal interests that could arise as a result of financial interests in suppliers, competitors or customers. We should not work simultaneously for a competitor, customer or supplier without obtaining the necessary authorisation from our manager.

In order to avoid potential conflicts of interest we should be mindful of any business arrangements where family members or close personal relationships may be involved. These relationships can include but are not limited to relatives, spouses, partners, in-laws and individuals living at your address. We must not put ourselves in a situation where such relationships could interfere with our ability to make objective decisions. Any arrangements where you have a direct/indirect reporting line with any of the above parties should be communicated to your manager.

Even the appearance of a conflict of interest may lead to reputational damage. If you have a potential conflict of interest or need clarification on this matter consult your manager for advice. Alternatively refer to the section "Raising a concern" for other channels through which you can raise concerns.

### ***Records management***

Good records management is important for effective and efficient operations as well as protecting important and sensitive information. Records can take many forms including written,



printed, and recorded materials, as well as electronic records (i.e., emails and documents saved electronically). Records should be managed in accordance with business, legal, financial and regulatory requirements and with any INM specific records management policies applicable from time to time.

Where records contain information relating to a current or anticipated legal or regulatory action they should be preserved even if they would normally be destroyed.

Records should not be held for longer than expected. When destroying records we should exercise care. Paper documents should be shredded or rendered unreadable. Electronic records should be erased. If you have any questions on the area of records management please consult your manager.

### ***Co-operating with auditors***

During the course of its business INM is subject to internal and external audits. These include financial reporting, ABC circulation and tax audits. We are expected to fully co-operate with auditors. Falsifying business records, withholding information, making misleading statements or otherwise interfering with an audit is a violation of the code and may lead to disciplinary action.





## **Commitment to our community**

### ***The Law***

INM believes in full compliance with both the spirit and letter of the law in the countries in which it operates. Failure to adhere to local laws, rules and regulations can result in investigations, fines, penalties and damage to our reputation. Where our policies and procedures are in conflict with the law we should always follow the law. Employees are not expected to be knowledgeable of every aspect of the law but should be aware of any legal or regulatory requirements which apply to their job. Where in doubt you should seek clarification from your manager.

### ***Social responsibility and environment***

As a global multimedia company that reaches millions of consumers each week, we are in a unique position to make a real difference to the communities in which it operates. The INM Group has an extensive track record of supporting large-scale humanitarian causes on both a global and local basis. It supports a wide variety of charitable organisations by making financial contributions and by providing editorial coverage. It also provides significant editorial coverage and support for environmental and health issues.

INM recognises its responsibility in safeguarding its environment for future generations to enjoy. This is achieved by:

- complying at a minimum with all relevant legislation;
- researching and applying best practices in environmental issues facing its sector ;
- evaluating and managing the environmental impact of current and potential future operations;
- conserving natural resources, including energy, raw materials and water; and
- implementing effective and responsible waste management and recycling procedures.

All employees within INM are encouraged to foster a spirit of social responsibility and support relevant environmental efforts undertaken by the INM Group.



### ***Bribery and corruption***

In order to protect our reputation and comply with local laws, we should never offer or take a bribe or act in any way that could be considered to be or to induce corruption. Bribes are anything of value including money, gifts, loans, favours, advantages, benefits in kind or entertainment that may influence a business or related decision or appear to do so. This is regardless of whether it is the norm within the country or industry that we are operating in. It applies to our dealings with government and public officials, customers, suppliers, auditors, unions, financial institutions and any other relevant stakeholders.

Small token gifts are acceptable when it is part of business customary practice but they should never be deemed to create an obligation. Cash or cash equivalents such as stocks, bonds and gift vouchers no matter how small should not be accepted or offered to avoid the appearance of bribery.

### ***Political activities and contributions***

The business has a general policy of not supporting political candidates or parties. Where an INM business believes that it is in the interest of the Group to support a political candidate or party, approval should be obtained in writing from the regional managing director and the group company secretary informed. Support can relate to direct financial aid but can also include providing benefits in kind or sponsorship. We do recognise the right of our employees to participate in legitimate political activities. These should be kept separate from INM activities. We should not use company assets or resources to support our private political interests.

## **Obtaining Advice and Raising Concerns**

### **Raising a concern**

At times we may have questions or require guidance on certain aspects of the code. It may be as simple as confirming that the current approach being adopted is the correct one. Alternatively we may be aware that the code is being violated and would like to speak to someone about it. The best place to start is by talking to our manager or supervisor. If you feel uncomfortable doing this then there are a number of other channels for raising concerns. These include:

- Local management team
- HR
- Internal Audit
- Group Company Secretary
- Group Chief Financial Officer

Within INM there is a policy of no retaliation. This means that INM will not penalise, or tolerate retaliation against any employee who reports a concern in good faith, even if that allegation is



found to be unsubstantiated.

While INM openly encourages its employees to raise concerns, any allegation that is made maliciously is considered to be a serious offence and may result in disciplinary action.

If you feel that you have been in violation of the code, you are urged to raise this matter immediately through one of the above channels. Admission of code violations will be looked on favourably, however the consequences of such violations will ultimately depend on the nature of the activity involved.

### **INM Ethics Helpline**

There may be instances where we do not feel comfortable raising a concern internally. In such cases we should use the "INM Ethics Helpline". This is a telephone based reporting tool through which we can raise concerns relating to financial reporting, bribery and corruption. It is monitored solely by the Head of Internal Audit & Risk who is independent of INM's management team and reports directly to INM's Audit Committee. All employees can call 24 hours a day, seven days a week to report any concerns they may have.

The Head of Internal Audit & Risk monitors this voicemail and when a concern is raised through this channel Internal Audit will instigate an investigation of any issue arising.

When raising concerns through this channel you are urged to provide as much information as possible so that the concern can be thoroughly investigated. Employees are encouraged to disclose their name and are assured that all calls are treated discretely and effectively. If you do not feel comfortable doing this you may raise a concern anonymously.



## **Making Ethical Decisions**

In some cases making an ethical decision can be very straightforward. However in other situations the decision may be more complicated. When evaluating an ethical dilemma we should ask ourselves the following questions:

- Does it feel right?
- Would I be happy if details of the situation were made public?
- Are any laws being broken?
- Is the health and safety of individuals being threatened?
- Could it harm INM's reputation?

Depending on answers to the above we should seek clarification or raise this concern through one of the appropriate channels.

### **Support**

Further guidance on the area of fraud risk management within INM can be found in the following policies:

- INM Anti-Fraud Policy
- INM Bribery and Corruption Policy
- INM Code of Conduct



## **Contact Information**

- **INM Ethics Helpline**  
+353 1 705 5365

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## IPSO: COMPLAINTS REGISTER

1. Introduction
2. The Register
3. The Register holder
4. Inspections
5. Availability for annual report and compliance

### INTRODUCTION:

The document was drawn up at the suggestion of the editors of the Belfast Telegraph and Sunday Life. It refers to the holding of separate Complaints Registers for both titles. These registers will form the repository of every complaint received, all paperwork concerning such complaints, actions initiated and the outcomes.

### BELFAST TELEGRAPH / SUNDAY LIFE REGISTER:

The Register will consist of a computer file recording each and every complaint received and all paperwork etc generated or received and the outcome of each complaint. This folder will be backed up in a process compliant with IT standards. Additionally, printed copies of all paperwork in each file are to be kept.

**COMPLAINTS SUMMARY DOCUMENT:** The Register's first page will consist of a Excel spreadsheet documenting and analysing each complaint under the following headings:

*Complainant's name*  
*Date of complaint*  
*Received by: email, phone, letter, in person*  
*Relevant Editors' code clause*  
*Summary of complaint*  
*Action taken*  
*Outcome (Resolved/Unresolved/Withdrawn)*

The summary document will be updated by the Register Holder after each complaint is received and when the outcome of a complaint is completed.

**INDIVIDUAL COMPLAINTS:** A separate folder will be created for each complaint. Each complaint is to be recorded on a separate Word document containing the following sections:

*Complainant's name*  
*Date of complaint*  
*Format: email, phone, letter, in person*  
*Received by (name of reporter, news editor etc)*  
*Relevant Editors' code clause*  
*Summary of complaint*  
*Pre-publication public interest discussion document (if applicable\*)*  
*Action taken*  
*Outcome (Resolved/Unresolved/Withdrawn)*

*\* Important: as per the Editors' Code, this needs to have been created before the deployment of the subterfuge, etc and not afterwards)*

All paperwork pertaining to the complaint, including notes and emails, are to be saved to the electronic folder, or if printed material lodged in the physical file. There is no need to print all the

paperwork unless and until required. (This might be for an editors' inspection, annual report, an IPSO interim inspection or an IPSO investigation, for example).

THE REGISTER HOLDER: Responsibility for upkeep and maintenance of each register is the responsibility of the title editor. However, it may be wise to delegate the day to day operation of the register – e.g. Bel Tel: *Margaret Thompson or Ed McCann/Gail Walker*, S Life: *Darwin Templeton or Stephen Gordon*.

INSPECTIONS: It is critically important registers are properly recorded and updated weekly. Be warned that IPSO may ask to see a complaints register at any time. During a standards investigation – and possibly at other times – IPSO has the power to inspect IT records of all documents to assess their creation and modification dates.

AVAILABILITY FOR ANNUAL REPORT: *Registers will form a central component of the annual report to IPSO. Paul Connolly has been designated the “responsible person” as per our IPSO contract and he will require access to registers for his Annual Report to IPSO.*



## IPSO COMPLAINTS PROTOCOL FOR ALL STAFF

### INTRODUCTION:

This document sets out the protocol for all members of staff to follow for the receiving and referral onwards of complaints about articles published by Belfast Telegraph/Sunday Life, and the behaviour of its journalists.


It applies to ALL complaints whether received in person, by phone, letter or email.

### PROCEDURE:

1. **INITIAL CONTACT:** The receiver must note and forward on the following: date/time, complainant's name, complaints address, phone number and email address (where applicable); nature of the complaint; date/page/headline/url of article complained of and a summary of the complaint. It is important that any threats of legal action are also noted.
2. **SUMMARY:** This must comprehensively note all aspects of the complaint including any comments made about standards and ethics of the newspaper and the behaviour of individual reporters (including if the receiver of the complaint is the reporter involved in publication).
3. **TONE:** The complaint should be received in a businesslike manner. It is not acceptable to be rude, hostile, indifferent, delaying, provocative, etc
4. **WORDS:** Words used to the complainant must reflect the Belfast Telegraph/Sunday Life's complaints policy. This is that "every complaint will be investigated and a response will be given to each and every complainant". Also that the newspaper "subscribes to the Editors' Code of Practice and to the press complaints body, IPSO". The complainant must be reassured that complaint will be treated seriously and will be passed to the editor or the editor's representative within two hours (or first thing in the morning if late at night).
5. **REFERRAL ONWARDS:** This must be done to your line manager as soon as possible, ideally within minutes. If a reply is not forthcoming, follow it up with a phone call for verbal confirmation. **NEVER ASSUME AN EMAIL HAS BEEN SEEN UNTIL YOU RECEIVE CONFIRMATION.** Keep confirmation emails in case these are required in the future.



IPSO complaints Sept - Dec 2014

IPSO complaint, date, name and number	Details of complaint	The Editor's Code Clause	How the complaint was dealt with	Outcome
BELFAST TELEGRAPH				
IPSO No: 01787.14 	Photographing a child without parental consent: child at funeral where gunmen firing salute - online publication only	6 (children)	email	Resolved directly with complainant
IPSO 01837-14 Gerry Adams TD	Hangover from PCC complaint "British" politician + BT campaign to undermine him - long history	1 Accuracy 4 Harassment 12 Discrimination	Email Letters Solicitor etc.	Not upheld
IPSO 03108-14 Date: 23.12.14 Brenna Aston	Complaint about a column - use of word 'ban' and outdated lyrics quoted end to page 3 pics	1 Accuracy	Emails	Not upheld

IPSO Complaint, date, name and Number	Details of Complaint	The Editor's Code Clause	How the complaint was dealt	Outcome
IPSO 03104-14 [REDACTED]	Complaint about a column - use of word 'ban' and outdated lyrics quoted end to page 3 pics	1 Accuracy	Emails	IPSO found no breach of the code after investigation
SUNDAY LIFE				
IPSO: 143792 [REDACTED]	Case straddled PCC/IPSO handover: complaint about a story headlined: 'I will blow lid on care home abuse'	1. Accuracy 2. Harassment	Emails, letters	PCC/IPSO found no breach of the code after investigation.

THIS IS THE ONLY NEWSPAPER, & JOURNAL  
WBW welterweight title holder, was supported in court by a large crowd.

As Koca was led from the dock the boxer shouted abuse.

Earlier, district judge Des Perry had warned he would clear the court if the hearing was disrupted.

He said: "If proceedings are disrupted in any way, understand this is a very, very emotional situation, I will have no hesitation in clearing the court."

Koca, who has no fixed abode, spoke to confirm his name and that he understood the murder charge against him.

Mr Magee, who had followed his father into the boxing ring and had a promising career ahead of him, was also studying engineering at university. Police believe his killer lay in wait while he visited a friend's house in Summerhill Park in west Belfast.

Hundreds of local people turned out for a vigil in the street last night, including both his parents.

The court was told Koca, a

in writing via its website for guidance on what to do. The service is free. IPSO can then advise on whether it's likely you have grounds for a complaint and what to do about it. The normal procedure is for the complainant to then contact the publication's Editor directly. If no agreement is reached, the complainant can go back to IPSO to look for an adjudication or for it to take over the complaint.

■ Full details are available at [www.ipso.co.uk](http://www.ipso.co.uk). Alternatively email [complaints@ipso.co.uk](mailto:complaints@ipso.co.uk) or [inquiries@ipso.co.uk](mailto:inquiries@ipso.co.uk) or telephone 0300 123 2220 or the out of hours emergency number: 07659 152 656.

■ You can also write to IPSO, c/o Halton House, 20-23 Holborn, London EC1N 2JD.

**CIPR NI PRESS & MEDIA AWARDS 2014**  
**Newspaper of the Year**

**The Belfast Telegraph also won:**  
**NEWSPAPER JOURNALIST OF THE YEAR**  
**FEATURE JOURNALIST OF THE YEAR**  
**BUSINESS JOURNALIST OF THE YEAR**  
**SCOOP OF THE YEAR**

**CIPR NI PRESS & MEDIA AWARDS 2013**  
**Newspaper of the Year**

**UK SOCIETY OF EDITORS' AWARDS 2012**  
**Daily/Sunday Newspaper of the Year**



**A SUNDAY TELEGRAPH PUBLICATION**

# mal chal

from the moment of his arrest throughout 19 police interviews. Defence solicitor Eamon O'Connell said he intended to apply for bail in four weeks' time.

He said: "There is a full knowledge that this is a truly horrific crime. To take a child away in such circumstances is the worst that can happen to a parent. Koca, dressed in a grey suit, sat in the dock with his head folded and was flanked by prison guards. At times he looked towards Mr Magee.

He answered loudly and clearly "Yes" when asked by the judge if he understood the charges.

